

Local Plan Panel Meeting	
Meeting Date	25 July 2019
Report Title	Housing Delivery Test Action Plan
Cabinet Member	Cllr Mike Baldock, Cabinet Member for Planning
SMT Lead	Emma Wiggins
Head of Service	James Freeman
Lead Officer	Gill Harris
Key Decision	Yes/No
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. That the Panel note the content of the Housing Delivery Test Action Plan; 2. Recommend to Cabinet that the attached Housing Delivery Test Action Plan is agreed and submitted to the Secretary of State by the deadline of 19 August 2019.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to introduce the Council's draft Housing Delivery Test (HDT) Action Plan, a non-statutory report the Council has been asked to prepare as a result of failing the government's Housing Delivery Test published in February 2019.
- 1.2 The purpose of the HDT Action Plan is to set out the reasons for housing under-delivery when measured against the housing requirement in the area and identify the steps the Council intends to take to drive up delivery. It should also identify ways to reduce the risk of further under-delivery.
- 1.3 The draft Action Plan attached to this report sets out the reasons for under-delivery in Swale and sets out the various measures already underway by the Council to improve this. The Council is on track to improve delivery by continuing with the actions already planned and underway.
- 1.4 Whilst the HDT Action Plan is a national planning policy requirement, there are currently no sanctions if it is not submitted by the deadline, it is a useful tool for setting out the specifics of the situation in Swale and could provide value at planning appeals and at highlighting to government that many of the reasons for under-delivery are beyond the control of the Council and the planning system.
- 1.5 The Action Plan will need to be submitted with a covering letter from the Chair of the Local Plan Panel.

2 Background

- 2.1 The government published its Housing White Paper “Fixing our broken housing market” in February 2017. It set out a number of measures that would be introduced to speed up and increase housing delivery, to help the government achieve its target of delivering an additional 300,000 new homes a year.
- 2.2 One of the measures introduced is the Housing Delivery Test (HDT), which was formalised through the National Planning Policy Framework. This measures net additional dwellings provided against the target homes required with results on performance for each local planning authority in England issued annually in November, (the publication of the 2018 results being published late on 19 February 2019).
- 2.3 Swale Borough Council has an Objectively Assessed Need for housing of 776 new dwellings per annum. For the HDT, the delivery of new homes was assessed against this figure for the preceding three monitoring years as follows:

monitoring year	annual target	no. of dwellings delivered (annual figure)	total number of homes delivered for the 3 year HDT monitoring period)	total number of homes required (during the 3 year HDT monitoring period)	HDT measurement score	Housing Land Supply buffer required
2015/16	776	593				
2016/17	776	556				
2017/18	776	572	1,721	2328	74%	20%

- 2.4 By achieving a score in the HDT test of below 85%, the Council must apply a 20% buffer (instead of a 5% buffer) to the 5 year Housing Land Supply requirement. As a result of this the Council’s five year Housing Land Supply is 4.6 years and the ‘tilted balance’ in terms of determining planning applications is in play. With the normal 5% buffer Swale’s Housing Land Supply would total 5.6 years and put the Council in a much stronger position to defend decisions to refuse development which are not in accordance with local plan policy. The consequences of failing the HDT and needing to apply the 20% buffer are therefore significant.
- 2.5 The Housing Action Plan is an opportunity to feed back to Government the reasons for delivery below target. The draft attached at Appendix I to this item suggests that the reasons are not related to the planning context; and that simply applying a requirement to increase land supply is counter - productive.

3 Proposals

- 3.1 The recommendations are therefore:

1. That the Panel note the content of the Housing Delivery Test Action Plan;
2. Recommend to Cabinet that the attached Housing Delivery Test Action Plan is agreed and submitted to the Secretary of State by the deadline of 19 August 2019.

4 Alternative Options

- 4.1 The Council could choose not to submit a HDT Action Plan. There are no sanctions if such an action plan is not submitted but it would be prudent to do so as it explains the reasons behind the Council's lack of delivery and could potentially be a useful tool that sets out the Council's position in this regard.

5 Consultation Undertaken or Proposed

- 5.1 There is no formal requirement to consult on the Action Plan although engagement with relevant stakeholders is recommended. The Council sought views from developers in producing the Housing Land Supply Statement (February 2019) and this forms much of the evidence for the Action Plan.

6 Implications

Issue	Implications
Corporate Plan	Supports the Council's corporate priorities for delivering regeneration and delivering improved quality of life.
Financial, Resource and Property	The Assessment has been carried out within the existing Local Plan resources.
Legal, Statutory and Procurement	None anticipated at this time.
Crime and Disorder	None anticipated at this time
Environment and Sustainability	None anticipated at this time
Health and Wellbeing	None anticipated at this time
Risk Management and Health and Safety	None anticipated at this time
Equality and Diversity	None anticipated at this time
Privacy and Data Protection	None anticipated at this time

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Swale Borough Council Housing Delivery Test Action Plan

8 Background Papers

Statement of Housing Land Supply 2017/18 February 2019
<https://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/HousingLandSupply/Statement-of-2017-18-housing-land-supplypostHDTV2.pdf>